IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

NATIONAL RELIGIOUS BROADCASTERS, SAND SPRINGS CHURCH, FIRST BAPTIST CHURCH WASKOM, and INTERCESSORS FOR AMERICA

Plaintiffs,

v.

DANNY WERFEL, IN HIS OFFICIAL CAPACITY AS COMMISSIONER OF THE INTERNAL REVENUE SERVICE, and THE INTERNAL REVENUE SERVICE

Defendants.

Civil Action No. 6:24-cv-00311

Request for Oral Argument

Pursuant to this Court's order on April 25, 2025, Plaintiffs hereby respectfully request an oral argument on their Motion for Partial Summary Judgment which was filed on April 21, 2025. Additionally, if Defendants file a renewed Motion to Dismiss, Plaintiffs respectfully request an oral argument on that Motion as well. Plaintiffs believe that the issues to be resolved in said motions substantially overlap and believe that a consolidated hearing may well serve the interests of judicial economy.

Respectfully submitted this 29th day of April 2025,

MICHAEL P. FARRIS Attorney for Plaintiffs

/s/Michael P. Farris
Michael Farris
DC Bar No. 385969
National Religious Broadcasters
20 F Street
Seventh Floor
Washington, DC 20001
571-359-6000
mfarris@nrb.org

David A. Kallman
MI Bar No. P34200
Stephen P. Kallman
MI Bar No. P75622
Kallman Legal Group, PLLC
Attorney at Law
5600 W. Mount Hope Hwy.
Lansing, MI 48917
517-322-3207
dave@kallmanlegal.com
steve@kallmanlegal.com

Andrew W. Stinson State Bar No. 24028013 RAMEY & FLOCK, PC 100 E. Ferguson Street, Suite 500 Tyler, TX 75702 903-597-3301 andys@rameyflock.com Rita M. Peters State Bar No. 46821 7586 Stoney Lick Road Mount Crawford, VA 22841 540-830-1229 rpeters@selfgovern.com

ATTORNEYS FOR PLAINTIFFS